

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

*In Re:*

ANGIE D. VALENTIN,  
  
Debtor.

Case No.: 18 – 17497 – AMC

CHAPTER: THIRTEEN

**DEBTOR’S RESPONSE IN OPPOSITION TO THE TRUSTEE’S MOTION TO DISMISS  
TO THE HONORABLE JUDGES OF THE BANKRUPTCY COURT:**

Debtor, Angie D. Valentin, through her attorney, Joseph Vaccaro respectfully submits this opposition to the Trustee’s Motion to Dismiss (Documents 93, 94, 98, & 99).

1. Debtor has filed an amended plan to which no creditor nor the Trustee have objected.
2. Debtor respectfully submits & avers that any and all issues surrounding objections to the previous plans have been resolved.
3. Part of the delay in submitting a Chapter 13 plan to which no parties objected was the difficulty in reaching an amicable resolution of the City of Philadelphia’s claims due to the City shut-down imposed by the Covid-19 pandemic.
4. However, these issues have been resolved.
5. Throughout this time, Debtor has been making her monthly payments: the last payment she has made was on November 17, 2020; and the Trustee has made its last disbursement on the same day.
6. Debtor has paid a total of \$28,879.00 into the plan to date, out of \$46,754.93: a little over 61%.
7. A copy of the NDC and Account Statement are attached hereto.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the Trustee's instant motion, permit confirmation of the plan and permit this case to conclude.

RESPECTFULLY,

/s/ Joseph Vaccaro

JOSEPH VACCARO

ATTORNEY ID No.: 83366

5918 TORRESDALE AVENUE

PHILADELPHIA, PA 19135

TEL: 215-527-0887

FAX: 215-533-5353

[VACCAROTESQ@ERIELAWCENTER.COM](mailto:VACCAROTESQ@ERIELAWCENTER.COM)



## Case Number 1817497

### Debtor Information

Debtor 1 ANGIE D VALENTIN  
Debtor 2

### Trustee Information

Trustee William Miller

#### Status

Data Last Updated Nov 30, 2020

Total Paid into Plan \$28,879.00

Petition Filed on Nov 12, 2018

#### Debtor's Latest

##### Payments

MONEY ORDER \$1,000.00 11/17/2020

MONEY ORDER \$571.00 11/17/2020

MONEY ORDER \$1,000.00 10/26/2020

#### CASE INFORMATION

Case Number	1817497	Date Petition Filed	11/12/2018
Case Status	Active	Date Plan Filed	01/29/2019
NDC Case Status	Active-Open	First 341 Meeting Date	03/13/2019
Balance on Hand	\$26,515.85	Date Case Confirmed	
Last Receipt Date	11/17/2020	Date Case Closed	
Last Receipt Amount	\$1,000.00	Bar Date	01/21/2019
Last Disbursement Date	11/17/2020	Cleared Date	
Percentage to Unsecured	0.00%	Date First Payment Due	12/12/2018
Plan Base	\$46,754.93	Confirmation Hearing Date	
Total Paid into Plan	\$28,879.00	Final Report Date	
Total Paid to all Parties	\$2,363.15	Hold Permanent	
Total Paid to Creditors	\$0.00	Hold Temporary	
Plan Terms OR Estimated Months Remaining	36		
Delinquency Amount	\$4,713.00		
Court Case Number			
Proposed Length Of Plan			

#### TRUSTEE INFORMATION

Trustee Name William Miller  
Trustee Percentage 0.00  
Amount Paid to Date \$2,363.15

#### JUDGE/ATTORNEY INFORMATION

Judge Name AMC  
Attorney Name JOSEPH VACCARO  
Attorney Address

#### DEBTOR INFORMATION

Debtor 1		Debtor 2	
Debtor Name	ANGIE D VALENTIN	Debtor Name	
Mailing Address	4519 HIGBEE STREET	Mailing Address	

Attorney Fee in Plan \$0.00  
Attorney Paid to Date \$0.00  
Attorney Fee Paid Outside Plan \$0.00

PHILADELPHIA,  
PA 19135

Payroll  
Deduction  
Frequency  
M

Payroll  
Deduction  
Frequency  
M

Payment  
Amount  
\$1,571.00

Payment  
Amount  
\$0.00

PLAN STEPS				COURT DOCKET
START DATE	END DATE	NUMBER OF PAY PERIODS	PAYMENT AMOUNT	PAYMENT FREQUENCY
12/12/2018	06/12/2020	19	\$25,737.00	L
07/12/2020	11/12/2021	17	\$1,571.00	MONTHLY

Account Ledger



Case 1817497 Debtor1 ANGIE D VALENTIN Trustee MILLER, WILLIAM (PHILADELPHIA, PA)

Filter By

All Claims

All Payees

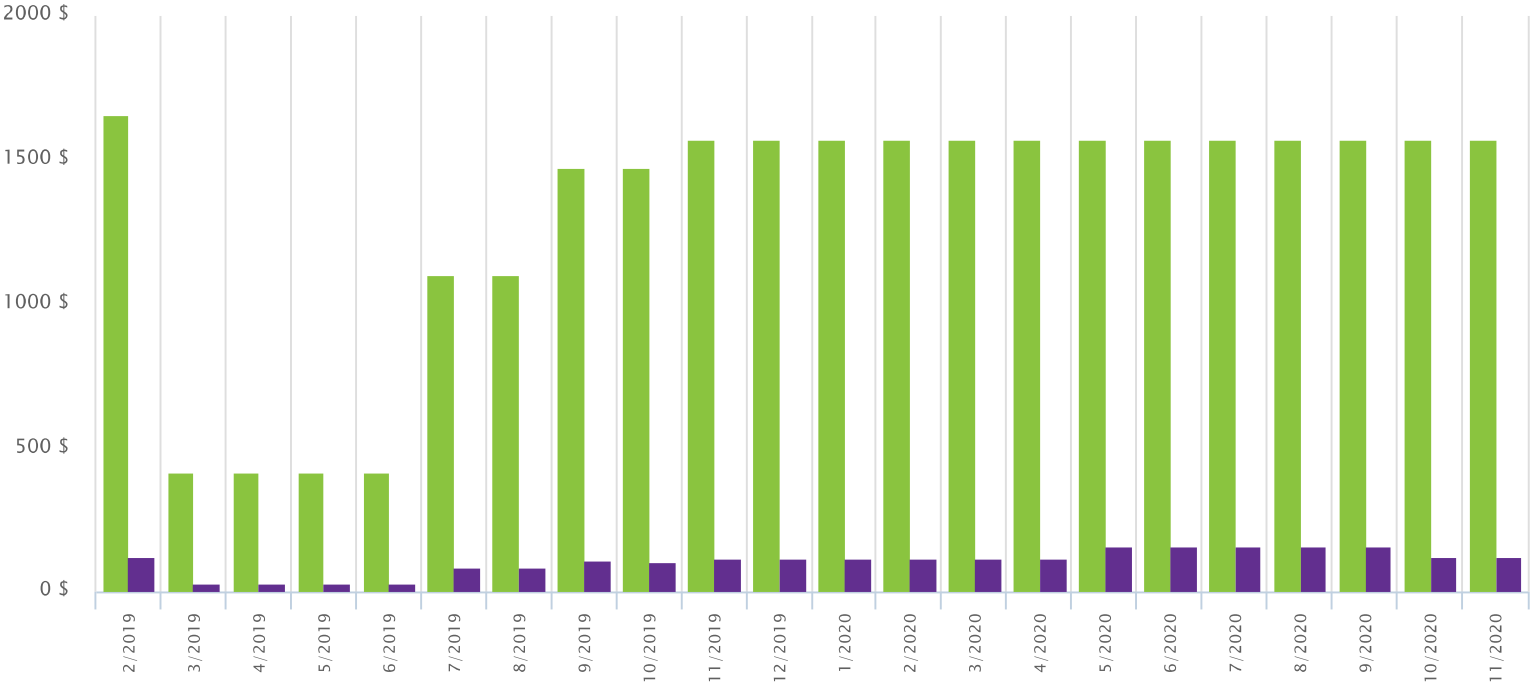
All Transactions

All Time

Receipts & Disbursements

RECEIPTS

DISBURSEMENTS



DATE PAID	CLAIM NUMB ER	CHECK NUMB ER	NAME OF PARTY	DESCRIPTION	AMOUNT
11/17/2020			N/A	MONEY ORDER	\$1000.00
11/17/2020			N/A	MONEY ORDER	\$571.00
11/17/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$45.68
11/17/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$80.00
10/26/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$45.68
10/26/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$80.00
10/26/2020			N/A	MONEY ORDER	\$1000.00
10/26/2020			N/A	MONEY ORDER	\$571.00
09/23/2020			N/A	MONEY ORDER	\$1000.00
09/23/2020			N/A	MONEY ORDER	\$571.00
09/23/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$57.10
09/23/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$100.00

DATE PAID ▼	CLAIM NUMBER	CHECK NUMBER	NAME OF PARTY	DESCRIPTION	AMOUNT
08/26/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$57.10
08/26/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$100.00
08/26/2020		N/A		MONEY ORDER	\$1000.00
08/26/2020		N/A		MONEY ORDER	\$571.00
07/23/2020		N/A		MONEY ORDER	\$1000.00
07/23/2020		N/A		MONEY ORDER	\$571.00
07/23/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$57.10
07/23/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$100.00
06/24/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$57.10
06/24/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$100.00
06/24/2020		N/A		MONEY ORDER	\$1000.00
06/24/2020		N/A		MONEY ORDER	\$571.00
05/20/2020		N/A		MONEY ORDER	\$1000.00
05/20/2020		N/A		MONEY ORDER	\$571.00
05/20/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$57.10
05/20/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$100.00
04/22/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$41.68
04/22/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$73.00
04/22/2020		N/A		MONEY ORDER	\$1000.00
04/22/2020		N/A		MONEY ORDER	\$571.00
03/24/2020		N/A		MONEY ORDER	\$1000.00
03/24/2020		N/A		MONEY ORDER	\$571.00
03/24/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$41.68
03/24/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$73.00
02/20/2020		N/A		MONEY ORDER	\$1000.00
02/20/2020		N/A		MONEY ORDER	\$571.00
02/20/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$41.68
02/20/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$73.00
01/21/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$41.68
01/21/2020		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$73.00
01/21/2020		N/A		MONEY ORDER	\$1000.00

DATE PAID ▼	CLAIM NUMBER	CHECK NUMBER	NAME OF PARTY	DESCRIPTION	AMOUNT
01/21/2020			N/A	MONEY ORDER	\$571.00
12/19/2019			N/A	MONEY ORDER	\$1000.00
12/19/2019			N/A	MONEY ORDER	\$571.00
12/19/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$41.68
12/19/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$73.00
11/20/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$41.68
11/20/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$73.00
11/20/2019			N/A	MONEY ORDER	\$1000.00
11/20/2019			N/A	MONEY ORDER	\$571.00
10/10/2019			N/A	MONEY ORDER	\$1000.00
10/10/2019			N/A	MONEY ORDER	\$472.00
10/10/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$34.46
10/10/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$73.00
09/10/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$35.87
09/10/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$76.00
09/10/2019			N/A	MONEY ORDER	\$1000.00
09/10/2019			N/A	MONEY ORDER	\$472.00
08/14/2019			N/A	MONEY ORDER	\$1000.00
08/14/2019			N/A	MONEY ORDER	\$100.00
08/14/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$7.60
08/14/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$76.00
07/22/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$7.60
07/22/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$76.00
07/22/2019			N/A	MONEY ORDER	\$1000.00
07/22/2019			N/A	MONEY ORDER	\$100.00
06/07/2019			N/A	MONEY ORDER	\$414.00
06/07/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$31.46
05/20/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$31.46
05/20/2019			N/A	MONEY ORDER	\$414.00
04/29/2019			N/A	MONEY ORDER	\$414.00
04/29/2019	0000000		WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$31.46

DATE PAID ▼	CLAIM NUMBER	CHECK NUMBER	NAME OF PARTY	DESCRIPTION	AMOUNT
03/13/2019		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$31.46
03/13/2019			N/A	MONEY ORDER	\$414.00
02/20/2019			N/A	MONEY ORDER	\$414.00
02/20/2019		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$31.46
02/04/2019		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$31.46
02/04/2019		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$31.46
02/04/2019		0000000	WILLIAM MILLER	DISBURSEMENT CHECK (PRINCIPAL)	-\$31.46
02/04/2019			N/A	MONEY ORDER	\$414.00
02/04/2019			N/A	MONEY ORDER	\$414.00
02/04/2019			N/A	MONEY ORDER	\$414.00



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

*In Re:*

ANGIE D. VALENTIN,  
  
Debtor.

Case No.: 18 – 17497 – AMC

CHAPTER: THIRTEEN

**CERTIFICATE OF SERVICE**

It is hereby Certified that a True & Correct Copy of the within

**RESPONSE IN OPPOSITION TO THE TRUSTEE’S MOTION TO DISMISS**

was served upon ALL PARTIES today, via the Court’s Electronic Filing System:

RESPECTFULLY,

/s/ Joseph Vaccaro

JOSEPH VACCARO

ATTORNEY ID No.: 83366

5918 TORRESDALE AVENUE

PHILADELPHIA, PA 19135

TEL: 215-527-0887

FAX: 215-533-5353

[VACCAROESQ@ERIELAWCENTER.COM](mailto:VACCAROESQ@ERIELAWCENTER.COM)